EXHIBIT B

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, MARIA NGUYEN, WILLIAM BYATT, JEREMY DAVIS, and CHRISTOPHER CASTILLO, individually and on behalf of all similarly situated,

    Plaintiffs,

       v.

GOOGLE LLC,

    Defendant.

Case No. 5:20-cv-03664-LHK

DECLARATION OF ALEXEI SVITKINE

Judge: Honorable Lucy H. Koh

1   I, Alexei Svitkine, declare as follows:

2   1.   I am a Software Developer at Google responsible for the X-Client-Data header. I am

3   submitting this declaration because I understand that there are some misperceptions about the use of

4   the X-Client-Data header when it is sent from instances of Chrome that are used to visit the Court's

5   website.

6   2.   Google is constantly developing new versions of the Chrome browser. To ensure new

7   features are working as intended, Google sometimes enables the feature for a subset of Chrome users

8   before officially launching the feature to all users of Chrome. The purpose of the X-Client-Data

9   header is for Google services to be informed of the Chrome variations being run on a particular

10   instance of the Chrome browser.

11   3.   Various Google services need to know what variations are being run on the Chrome

12   browser to evaluate the effect of different variations on Google servers. For example, a networking

13   change may affect YouTube load speeds, or a change to the Chrome search box may result in more

14   helpful Google Search results. In the case of the Court's website, a networking change may affect the

15   speed with which fonts are loaded via the Google Fonts API.

16   4.   The X-Client-Data header is designed to have low entropy and is not uniquely

17   identifying. Indeed, the header assigned to a particular instance of Chrome is based on a random

18   number from 0 to 7999 precisely to prevent it from being used to uniquely identify the user or

19   browser. In practical terms, this means that the X-Client-Data header for any particular instance of

20   Chrome is identical to the header assigned to many other Chrome users.

21   5.   The X-Client-Data header is not designed to be combined with other identifiers (such

22   as IP Addresses and User Agents) to become uniquely identifying.

23   6.   The X-Client-Data header is not designed to identify users; to create profiles on users;

24   to "fingerprint" users; or to enable Google to serve advertising.

25   7.   The X-Client-Data header is not sent in Chrome's Incognito mode.

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1   I declare under penalty of perjury of the laws of the United States that the foregoing is true

2 and correct. Executed in Montreal, Canada on March 10, 2021.

/s/ _Alexei Svitkine_

Alexei Svitkine